

Honorable Ronald B. Leighton

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON

DOUGLAS FERRIE, an individual

Plaintiff,

v.

WOODFORD RESEARCH, LLC, a Kentucky
limited liability company; HUBERT SENTERS,
an individual; ROSS GIVENS, an individual;
JARED CARTER, an individual; DPT
INNOVATIONS LLC d/b/a
ARBITRAGING.CO, a foreign company;
DAVID PETERSON a/k/a JEREMEY
ROUNSVILLE, an individual; INFOGENESIS
CONSULTING GROUP, LLC, a Nevada limited
liability company; KURT F. WEINRICH, SR.,
an individual,

Defendants.

Case No. 3:19-cv-05798-RBL

**JOINT NOTICE REGARDING
STATUS OF MEDIATION
EFFORTS AND REQUEST FOR
STATUS CONFERENCE**

On November 14, 2019, Plaintiff Douglas Ferrie (“Plaintiff”); Defendants Woodford
Research, LLC, Hubert Senters, Karen Arvin, Ross Givens, Jared Carter, Infogenesis
Consulting Group, LLC, and Kurt Weinrich, Sr. (“Defendants”); and former Defendants

Horizon Trust Company LLC and Greg Herlean (all of them together, “the Parties”)¹ brought a stipulated motion asking the Court to stay all proceedings in this matter and vacate the then-pending case deadlines while they attempted to resolve this matter through mediation. Dkt. # 20. The Court granted the Parties’ request and entered an Order: (i) vacating the then-pending deadlines, (ii) staying these proceedings until December 20, 2019, and (iii) directing the parties to advise the Court by December 20, 2019 as to the results of the mediation conference and to request a status conference. Dkt. # 21.

On December 4, 2019, the Parties identified above² participated in a mediation session in Seattle, Washington before the Honorable Judge Jeffrey M. Ramsdell (Ret.). The Parties were, however, unable to reach a resolution to this matter. Moreover, the Parties have not reached a settlement by the December 20, 2019 deadline set in the Court’s order staying proceedings.

Therefore, the Parties³ respectfully ask the Court to set a status conference as contemplated in the Court’s Order. The Parties understand, however, that Plaintiff plans to request leave to file an amended complaint, and that Defendants reserve their rights with respect to contesting that request. Accordingly, the Parties respectfully recommend that the Status Conference not be scheduled until after resolution of Plaintiff’s request to file an amended complaint.

¹ On December 19, 2019, Plaintiff filed a Notice of Voluntary Dismissal under Fed. R. Civ. P. 41(a)(1)(A) dismissing without prejudice his claims against former Defendants Horizon Trust Company, LLC, Greg Herlean, and Daniel Ensign. Dkt. # 24. They are no longer parties to this case. Thus, the term “Parties” when used in this Notice to describe events occurring after the filing of Dkt. # 24 does not include Horizon Trust or Mr. Herlean.

² Defendants Daniel Ensing, David Peterson a/k/a/ Jeremy Rounsville, and DPT Innovations LLC d/b/a Arbitraging,co have not been served and did not participate in the mediation.

³ See Footnote 1.

1 DATED this 20th day of December, 2019.

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CERTIFICATE OF ECF FILING AND SERVICE

I certify that on December 20, 2019, I arranged for electronic filing of the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all parties of record.

/s/ Aaron E. Millstein
Aaron E. Millstein, WSBA #44135